

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

TIERRA TELECOM, INC., )  
Plaintiff, )  
v. ) Case No.: 1:10-CV-0095 (TSE/JFA)  
LEVEL 3 COMMUNICATIONS, INC., )  
et al., )  
Defendants. )

**GLOBAL CROSSING TELECOMMUNICATIONS, INC.'S**  
**MOTION FOR PROTECTIVE ORDER**

Defendant Global Crossing Telecommunications, Inc. (“Global Crossing”), by counsel, moves, pursuant to Fed. R. Civ. P. 26(c) for entry of a Protective Order barring the depositions of Robert Nance, Debra Swann, Adam Uzelac and Christopher Smith, which plaintiff Tierra Telecom, Inc. has noticed for April 29, 2010. The grounds for this motion are more fully set forth in Global Crossing’s Memorandum in Support of Motion to Quash and for Protective Order, which is filed contemporaneously herewith. Counsel states that a good faith effort has been made between counsel to resolve the discovery matters at issue in accordance with Local Rule 37(E).

# GLOBAL CROSSING TELECOMMUNICATIONS, INC.

By: \_\_\_\_\_ /s/  
Of Counsel

Louis Edward Dolan, Jr., VSB # 34437  
[ldolan@nixonpeabody.com](mailto:ldolan@nixonpeabody.com)  
NIXON PEABODY LLP  
401 9<sup>th</sup> St., NW, Suite 900  
Washington, D.C. 20004-2128  
(202) 585-8000  
(202) 585-8080 (Fax)

Richard D. Rochford, VSB # 24651  
[rrochford@nixonpeabody.com](mailto:rrochford@nixonpeabody.com)  
NIXON PEABODY LLP  
1100 Clinton Square  
Rochester, NY 14604  
(585) 263-1000  
(585) 263-1600 (Fax)

Dabney J. Carr, IV, VSB #28679  
[dabney.carr@troutmansanders.com](mailto:dabney.carr@troutmansanders.com)  
TROUTMAN SANDERS LLP  
P. O. Box 1122  
Richmond, Virginia 23218-1122  
(804) 697-1200  
(804) 697-1339 (Fax)

*Counsel for Global Crossing Telecommunications, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on this 16<sup>th</sup> day of April, 2010, a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Alan M. Fisch  
[alan.fisch@kayescholer.com](mailto:alan.fisch@kayescholer.com)  
Jason F. Hoffman  
[jason.hoffman@kayescholer.com](mailto:jason.hoffman@kayescholer.com)  
Coke Morgan Stewart  
[coke.stewart@kayescholer.com](mailto:coke.stewart@kayescholer.com)  
R. William Sigler  
[bill.sigler@kayescholer.com](mailto:bill.sigler@kayescholer.com)  
KAYE SCHOLER LLP  
The McPherson Building  
901 Fifteenth Street, N.W.  
Washington, D.C. 20005-2327

Attorneys for Tierra, Inc.

Jonathan G. Graves  
[jgraves@cooley.com](mailto:jgraves@cooley.com)  
Robert D. Spendlove  
[rspendlove@cooley.com](mailto:rspendlove@cooley.com)  
COOLEY GODWARD KRONISH LLP  
One Freedom Square, Reston Town Center  
11951 Freedom Drive  
Reston, VA 20190-5656

Attorneys for Qwest Communications  
Company, LLC

Kimberly S. Walker  
[kwalker@fulbright.com](mailto:kwalker@fulbright.com)  
FULBRIGHT & JAWORSKI LLP  
801 Pennsylvania Avenue NW  
Washington, D.C. 20004-2623

Attorneys for Level 3 Communications, Inc.  
and Level 3 Communications LLC

/s/  
Dabney J. Carr, IV, VSB #28679  
[dabney.carr@troutmansanders.com](mailto:dabney.carr@troutmansanders.com)  
TROUTMAN SANDERS LLP  
1001 Haxall Point  
Richmond, Virginia 23219  
Telephone: (804) 697-1238  
Facsimile: (804) 698-5119  
Counsel for Defendant Global Crossing  
Telecommunications, Inc.

#1938568